

## CT Corporation

Service of Process  
Transmittal

04/07/2009

CT Log Number 514687590



**TO:** Kim Lundy  
Wal-Mart Stores, Inc.  
702 SW 8th Street  
Bentonville, AR 72716

**RE:** Process Served in Wisconsin

**FOR:** Wal-Mart Associates, Inc. (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Pamela K. Moran, Pltf. vs. Walmart Associates, Inc., Dft.  
*Name discrepancy noted.*

**DOCUMENT(S) SERVED:** Summons, Complaint

**COURT/AGENCY:** Outagamie County Circuit Court, WI  
Case # 09 CV 695

**NATURE OF ACTION:** Employee Litigation - Wrongful Termination - The plaintiff's employment at Walmart Supercenter located at 955 Mutual Way, Appleton, Wisconsin was terminated on December 23, 2008 due to statements made to the Grand Chute Police Department regarding drug use and thief

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Madison, WI

**DATE AND HOUR OF SERVICE:** By Process Server on 04/07/2009 at 13:20

**APPEARANCE OR ANSWER DUE:** Within 20 days of service of this Summons, exclusive of the day of service

**ATTORNEY(S) / SENDER(S):** Bree A. Madison  
Silton Seifert Carlson, S.C.  
331 E. Washington Street  
Appleton, WI 54911  
920-739-2366

**REMARKS:** Note: Documents altered by process server prior to receipt by C T Corporation System to indicate intended recipient.

**ACTION ITEMS:** CT has retained the current log, Retain Date: 04/07/2009, Expected Purge Date: 04/12/2009  
Image SOP  
Email Notification, Melanie McGrath-CT East  
CLS-VerificationEast@wolterskluwer.com

**SIGNED:**  
**PER:** C T Corporation System  
Tamara Horn  
**ADDRESS:** 8040 Excelsior Drive  
Suite 200  
Madison, WI 53717  
608-833-4821

**TELEPHONE:**

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Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

**EXHIBIT****A**

STATE OF WISCONSIN

CIRCUIT COURT  
Branch 7

OUTAGAMIE COUNTY

PAMELA K. MORAN  
120 West Pacific Street  
Appleton WI 54911,

CLERK OF CIRCUIT COURT  
OUTAGAMIE COUNTY  
Plaintiff, FILED

CASE NO: 09CV695  
CODE NO: 30106

v.

WALMART ASSOCIATES, INC.,  
A Foreign Corporation,  
702 SW 8<sup>th</sup> Street, #0555  
Bentonville AR 72716-0555,

APR - 3 2009

Defendant:

**SUMMONS**

THE STATE OF WISCONSIN TO EACH DEFENDANT IDENTIFIED ABOVE:

You are hereby notified that the Plaintiff named above has filed a lawsuit or other legal action against you. The Complaint, which is attached, states the nature and basis of the legal action. You must respond with a written Answer, as that term is used in Chapter 802 of the Wisconsin Statutes, to the Complaint.

Your written Answer must be served according to the time period applicable to your status as a Defendant or to the kinds of claims in the Complaint. The time period for serving your written Answer will be the most applicable, as follows:

- a) Within twenty (20) days, exclusive of the day of service, after the Summons has been served personally on you, or served by substitution personally upon another authorized to accept service of the Summons for you; or
- b) If you, the Defendant, are the state, or an officer, agent, employee, or agency of the state, then your written Answer must be served within forty-five (45) days, exclusive of the day of service, after the Summons has been served personally on you, or served by substitution personally upon another authorized to accept service of the Summons for you; or
- c) If you, the Defendant, are an insurance company, then your written Answer must be served within forty-five (45) days, exclusive of the day of service, after the Summons has been served personally on you, or served by substitution personally upon another authorized to accept service of the Summons for you; or
- d) If any cause of action raised in the Complaint is founded in tort, then your written

Answer must be served within forty-five (45) days, exclusive of the day of service, after the Summons has been served personally on you, or served by substitution personally upon another authorized to accept service of the Summons for you; or

The Court may reject or disregard an Answer that does not follow the requirements of the statutes.

The Answer must be sent or delivered to the Court, whose address is:

Clerk of Circuit Court  
Outagamie County Justice Center  
320 S. Walnut St.  
Appleton, Wisconsin 54911

and to Plaintiff's attorneys at:

Attorney Bree A. Madison  
Silton Seifert Carlson, S.C.  
331 East Washington Street  
Appleton, Wisconsin 54911

You may have an attorney help or represent you.

If you do not provide a proper Answer within the time period applicable to you, or to the type of claim(s) in the Complaint, and which time period is either twenty (20), or forty-five (45) days, as described above, the Court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is or may be incorrect in the Complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated this 3 day of April, 2009.

SILTON SEIFERT CARLSON, S.C.  
Attorneys for Plaintiff Pamela Moran

BY: Bree Madison  
Bree A. Madison  
State Bar No. 1065713  
331 E. Washington Street  
Appleton WI 54911  
(920) 739-2366

PAMELA K. MORAN  
120 West Pacific Street  
Appleton WI 54911,

CASE NO: 09CV695  
CODE NO: 30106

v.

WALMART ASSOCIATES, INC.,  
A Foreign Corporation,  
702 SW 8<sup>th</sup> Street, #0555  
Bentonville AR 72716-0555,

Plaintiff,  
CLERK OF CIRCUIT COURT  
OUTAGAMIE COUNTY  
FILED

APR - 3 2009

Defendant.

**COMPLAINT**

The Plaintiff, PAMELA K. MORAN, through her attorneys, Sifton Seifert Carlson, S.C., by Bree A. Madison, as and for her Complaint against the Defendant, WALMART ASSOCIATES, INC., herein alleges and shows the Court as follows:

1. Pamela K. Moran is an adult resident of Appleton, Wisconsin, and, more specifically, resides at 120 West Pacific Street, Appleton, Wisconsin, 54911.
2. Upon information and belief, Walmart Associates, Inc. is a Delaware Corporation with its principal office at 702 SW 8<sup>th</sup> Street, #0555, Bentonville, Arkansas, 72716-0555.
3. Upon information and belief, Walmart's registered agent is CT Corporation Systems, 8040 Excelsior Drive, Suite 200, Madison, Wisconsin, 53717.
4. This Court has jurisdiction based on Wisconsin's Long Arm Statute, Wis. Stat. § 801.05.

5. For approximately ten (10) years, Pam Moran was employed by Walmart Associates, Inc. and, more specifically, was employed at the Walmart Supercenter retail store located at 955 Mutual Way, Appleton, Wisconsin, 54913.
6. Pam Moran's employment was terminated on December 23, 2008.
7. On and around December 23, 2008, the Defendant made defamatory statements against Plaintiff, namely:
  - a. The Defendant's agents and employees made one or more statements to the Grand Chute Police Department and to Plaintiff's co-workers and to others that Plaintiff is a drug user and a thief;
  - b. The aforementioned statements were false;
  - c. The statements by Defendant to the Grand Chute Police Department and others tend to harm the reputation of Plaintiff;
  - d. The statements by Defendant to the Grand Chute Police Department and others were made out of motives of retaliation, ill-will, spite, revenge, and other bad motives.
8. As a result of Defendant's defamatory statements, the Plaintiff and her family have been damaged in an amount to be determined by the Court/jury.

**WHEREFORE**, Plaintiff requests entry of judgment against Defendant as follows:

- i) For Plaintiff's actual damages;
- ii) For judgment in Plaintiff's favor and against Defendant for each claim identified herein;
- iii) For Plaintiff's actual damages, compensatory damages, and punitive damages as allowed by law;

- iv) For Plaintiff's actual reasonable attorneys' fees, expenses, and costs as allowed by law; and
- v) For all other relief by law and deemed just and equitable by the Court.

Dated this 3 day of April, 2009.

SILTON SEIFERT CARLSON, S.C.  
Attorneys for Plaintiff Pamela Moran

BY: Bree A. Madison  
Bree A. Madison  
State Bar No. 1065713  
331 East Washington Street  
Appleton WI 54911  
(920) 739-2366